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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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SPECIAL SERVICES FEES
AND CLASSIFICATIONS

Docket No. ~~MC96-3~~ ^{POSTAL RATE COMMISSION}
^{OFFICE OF THE SECRETARY}

MAJOR MAILERS ASSOCIATION'S MOTION REQUESTING
PERMISSION TO CORRECT A PAGE
IN ITS NOVEMBER 18 OPPOSITION TO THE POSTAL SERVICE'S
NOVEMBER 14 MOTION TO STRIKE

Major Mailers Association requests leave to file the attached revision to page 8 of its November 18 response to the Postal Service's November 14 motion. The attachment makes only one change. It revises a parenthetical sentence, on lines 1 and 2, regarding a facsimile transmission from the Postal Service to MMA counsel. As revised, the sentence reflects MMA counsel's understanding that Postal Service attempted to notify MMA counsel by facsimile on November 14, the day the Postal Service's motion was filed, but that the Postal Service's transmission of the facsimile was delayed by inadvertence.

Respectfully submitted,



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November 22, 1996

Counsel for MMA

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document (1) upon the U.S. Postal Service by facsimile and (2) upon the other parties by First-Class Mail.



Jeffrey Plummer

November 22, 1996

only four business days before Mr. Bentley is due to testify on November 19. (On the following day, the Service notified MMA counsel about its motion.) (See Attachment 1.)

There is no valid excuse for the Service's tardiness. Six weeks ago, on September 30, Mr. Bentley filed his testimony, explaining his use of PRC-LR-1 and LR-2. And on October 25, in response to the Service's First Set of Interrogatories, Mr. Bentley acknowledged that he had "not attempted to make the detailed calculations" that the Service requested about the apportionment of costs (USPS/MMA-6(c)) and that he had simply "accept[ed] the Commission's representation" in PRC-LR-1 and LR-2 (USPS-MMA-8(a)).¹

The Postal Service's tardiness is sufficient reason to deny its motion.

FOR THE FOREGOING REASONS, MMA asks that the Postal Service's Motion to Strike, dated November 14, 1996, be denied as to MMA witness Bentley's testimony.

Respectfully submitted,



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November 18, 1996

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² Although Mr. Bentley elaborated these points in his November 7 response to the Service's Second Set of Interrogatories, the Service did not need to await these in order to file its motion (especially since it had filed a similar motion to strike Mr. Bentley's testimony that relied upon a similar PRC workpaper in Docket No. R94-1).